

# EXHIBIT I

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
LI RONG GAO, SHU F. JIANG and XIAO HONG ZHENG,  
Individually and on behalf of all others  
similarly situated,

WEI S. TAN and WEI J. WU, Individually,  
Plaintiffs,

-against-

Case No.  
10-CIV-1637

PERFECT TEAM CORPORATION d/b/a GUANG ZHOU RESTAURANT,  
JI SHIANG, INC., d/b/a GUANG ZHOU RESTAURANT, FENG  
LIN, CHUN KIT CHENG a/k/a JUN JIE ZHENG, JIA LI WANG  
and ZHOU PING CHEN a/k/a CHEUK PING CHEN,

Defendants.  
-----X

Bee Reporting Depo Center  
315 Madison Avenue  
New York, New York

February 13, 2012  
9:40 a.m.

DEPOSITION of CHUN KIT CHENG, a  
Defendant in the above-entitled action, held at the  
above time and place, taken before Joanna Mystkowski,  
a Notary Public of the State of New York, pursuant to  
the Federal Rules of Civil Procedure and stipulations  
between Counsel.

COPY

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1

2 A P P E A R A N C E S

3

4 URBAN JUSTICE CENTER

Attorneys for the Plaintiffs  
123 William Street - 16th floor  
New York, New York 10038

6

By: AMY TAI, ESQ.  
DAVID COLODNY, ESQ.

8

9 LAW OFFICES OF BENJAMIN B. XUE, PC

Attorney for the Defendants  
Ji Shiang, Inc. d/b/a Guang Zhou  
Restaurant and Feng Lin  
401 Broadway - suite 1009  
New York, New York 10013

10

11

12

By: (NOT PRESENT)

13

14

SAMUEL CHUANG, ESQ.

15

16

17

18

19 ALSO PRESENT:

20 KA K. CHUI - Mandarin Interpreter

21 JIA LI WANG

22 THERESA CHALHOUB

23

24

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STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED, by  
and between the attorneys for the respective parties  
hereto, that the filing, sealing and certification of  
the within deposition shall be and the same are  
hereby waived;

IT IS FURTHER STIPULATED AND AGREED  
that all objections, except as to form of the  
question, shall be reserved to the time of the trial;

IT IS FURTHER STIPULATED AND AGREED  
that the within deposition may be signed before any  
Notary Public with the same force and effect as if  
signed and sworn to before the Court.

\* \* \*

4

1

2 K A K. C H U I,

3 having first been duly sworn by a Notary

4 Public of the State of New York, to

5 accurately and faithfully translate from

6 English to Mandarin and Mandarin to English,

7 the best of their ability, is as follows:

8 C H U N K I T C H E N G,

9 having been first duly sworn by a Notary

10 Public of the State of New York was

11 examined and testified as follows:

12 BY THE REPORTER:

13 Q State your full name for the record.

14 A Chun Kit Cheng.

15 Q State your address for the record.

16 A 64-56 Cloverdale Boulevard, Bayside,

17 New York 11364.

18 MS. TAI: Today is February 13th, 2012.

19 This deposition is being conducted at a

20 deposition suite of Bee Court Reporting at

21 315 Madison Avenue in New York, New York.

22 Today we have present in the room the

23 court reporter, Joanna Mystkowski. Myself,

24 Amy Tai and David Colodny, counsel for

25 Plaintiffs. Samuel Chuang, counsel for the

1 CHUN KIT CHENG

2 A I don't remember.

3 Q Did she say if the business was doing  
4 well?

5 A Seldom.

6 Q Did she tell you if the business was  
7 doing poorly?

8 A Sometimes, yes.

9 Q What would she say when she said that  
10 the business wasn't doing well?

11 A Well, in general she would just say  
12 that the cost of supplies increased a lot and the  
13 profit margin is so thin.

14 Q Did she say how much the costs were?

15 A Well, I just cannot recall anything  
16 about that.

17 Q Did she say what the profit margin was?

18 A Well, I don't recall at this time.

19 Q So Mr. Cheng, were you the president of  
20 Perfect Team?

21 A Yes.

22 Q When were you the president?

23 A I have been the president all the time.

24 Q Who decided you were going to be the  
25 president?

1 CHUN KIT CHENG

2 A My schedule? I don't have a work  
3 schedule.

4 Q Did you work at Guang Zhou Restaurant  
5 everyday?

6 A No.

7 Q How many days per week did you go to  
8 Guang Zhou Restaurant to work?

9 A It's hard to say. Most of the time, I  
10 would be there, but sometimes I was not there.

11 Q So let's take 2007, how often would you  
12 go to work?

13 A About three to four days per week.

14 Q How about in 2008?

15 A That's about the same.

16 Q And 2009?

17 A About the same.

18 Q So what time did you arrive at work?

19 A It varies.

20 Q What time did you usually get to work?

21 A 1:00 or 2:00 o'clock.

22 Q In the afternoon?

23 A Yes.

24 Q What time did you finish work?

25 A 9:00 or 10:00 p.m.

68

1

CHUN KIT CHENG

2

Q Did you sometimes arrive to work before

3

1:00 or 2:00 p.m.?

4

A It happened.

5

Q Did you sometimes work after 9:00 or

6

10:00 p.m.?

7

A Sometimes when it was getting busy, it

8

happened.

9

Q Okay. Did you have a break when you

10

were working at Guang Zhou Restaurant? And just to

11

clarify, I mean in a given day.

12

A Yes.

13

Q When would you have a break?

14

A It varies.

15

Q How long were your breaks usually?

16

A Between half an hour to one hour.

17

Q The three or four days that you went to

18

work, what days were they usually?

19

A It depends.

20

Q Did you usually go in on Saturday and

21

Sunday?

22

A Sometimes, yes. Sometimes, no.

23

Q Did someone tell you when you were

24

required to get to work?

25

A No.



1 CHUN KIT CHENG

2 Q So did you decide this for yourself?

3 A Correct.

4 Q Did you also decide for yourself when  
5 you would finish work?

6 A Yes.

7 Q From June 2007 to June 2009, did you  
8 interview or hire any employees at Guang Zhou  
9 Restaurant?

10 A No.

11 Q If you didn't interview the employees,  
12 who interviewed employees?

13 A Lai An.

14 Q Was there anyone else?

15 A No, I don't know. Mainly it's him.

16 Q From when to when was he in charge of  
17 interviewing employees at Guang Zhou Restaurant?

18 A From the time the restaurant opened  
19 until the time he left the restaurant.

20 Q So who interviewed potential employees  
21 for Guang Zhou Restaurant after Lai An left?

22 A Well, that would be those managers.

23 Q Which managers?

24 A The sales department manager.

25 Q Sorry?

72

1

CHUN KIT CHENG

2

3

Q Did you ever discuss with the sales manager about hiring any employees?

4

A No.

5

6

Q Did you tell the sales manager that they could hire employees?

7

A No.

8

9

Q If you wanted to hire an employee for Guang Zhou Restaurant prior to 2009, could you?

10

A No.

11

12

Q If you didn't like one of the employees that was hired, did you have any say in the matter?

13

A I can't do anything.

14

15

Q Did you ever recommend any employees to the sales manager?

16

A No.

17

18

Q Who else besides the sales manager had the power to hire employees at Guang Zhou Restaurant?

19

20

A I don't believe there would be any others.

21

Q Who hired Jia Li Wang?

22

A Lai An.

23

Q Who hired Lai An?

24

25

A That would be no one hired me or he. It was me and him working together.

1 CHUN KIT CHENG

2 Q Isn't it true you were the boss of the  
3 restaurant from June 2007 to June 2009?

4 A Yes.

5 Q So could someone else fire you if they  
6 wanted to at the restaurant?

7 A Yes.

8 Q Who could fire you?

9 A Lai An.

10 Q Could someone fire Lai An?

11 A No.

12 Q So you had no ability to fire Lai An?

13 A Yes.

14 Q How about after Lai An left, could  
15 someone fire you at the restaurant?

16 A No.

17 Q Could anyone fire Jia Li Wang if they  
18 wanted to?

19 A Which time period are you referring to?

20 Q We can start from when the restaurant  
21 first opened in June 2007.

22 A Lai An.

23 Q After Lai An left, could anyone fire  
24 Jia Li Wang if they wanted to?

25 A No one.

74

1

CHUN KIT CHENG

2

Q So you couldn't fire Jia Li Wang either  
3 after Lai An left?

4

A No way. She's my wife.

5

Q Have you ever fired anyone at Guang  
6 Zhou Restaurant prior to June 2009?

7

MR. CHUANG: Objection. Makes a  
8 statement about June 2009 about firing  
9 people, but you can answer the question.

10

A No.

11

Q So prior to June 2009, if you could  
12 fire someone, an employee at the restaurant, could  
13 you?

14

MR. CHUANG: Sorry, can you read that  
15 back?

16

(Whereupon, the requested question was  
17 read back by the reporter.)

18

MS. TAI: I can --

19

MR. CHUANG: You presume the answer.

20

MS. TAI: I can rephrase.

21

Q Prior to June 2009, could you fire  
22 employees at the restaurant if you wanted to?

23

A I can't. I couldn't.

24

Q No?

25

A No.

1 CHUN KIT CHENG

2 Q Why couldn't you fire -- why did you  
3 not have the ability to fire someone at the  
4 restaurant prior to June 2009?

5 A Because it is not -- this was something  
6 that's not in my jurisdiction.

7 Q So who had the power to fire employees  
8 at Guang Zhou Restaurant prior to June 2009?

9 A Manager.

10 Q Who was the manager?

11 A I don't remember.

12 Q Was there only one manager?

13 A Yes.

14 Q Just to be clear from June 2007 to June  
15 2009, there was only one manager who could fire  
16 employees at Guang Zhou Restaurant?

17 A Any managers would have that kind of  
18 power.

19 Q My question was --

20 MS. TAI: Can you read back my  
21 question?

22 (Whereupon, the requested question was  
23 read back by the reporter.)

24 A More than one.

25 Q How many managers were there?

76

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CHUN KIT CHENG

2

A I don't remember.

3

Q Two?

4

A I'm not so sure, really.

5

Q Do you remember any of their names?

6

A All I can remember is Kevin.

7

Q And when did Kevin work at the

8

restaurant?

9

A I don't recall.

10

Q Isn't it true that Kevin left the

11

restaurant before June 2009?

12

A I believe so.

13

Q So after Kevin, what managers had the

14

power to fire employees?

15

A I don't have that information.

16

Q If someone wanted to fire a manager,

17

who would be the person to fire the manager?

18

A Firing a manager?

19

Q Yes.

20

A Me.

21

Q Have you fired any managers before?

22

A No.

23

Q So in addition to the ability to fire a

24

manager, could you also fire other employees at the

25

restaurant?

82

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CHUN KIT CHENG

2 working?

3

A Which time period?

4

Q From June 2007 to June 2009?

5

A Yes, I did see them working.

6

Q Do you know how many days per week Li

7

Rong Gao worked at the restaurant prior to June 2009?

8

A I don't know.

9

MS. TAI: I think it might have been

10

translated a little differently than how I

11

asked it so I'm just going to ask the same

12

question again.

13

Q Do you know how many days per week did

14

Li Rong Gao work prior to June 2009?

15

A I don't have information.

16

Q Do you know if it was six days per

17

week?

18

A I don't know much about that.

19

Q Do you know if it was at least five

20

days a week?

21

A I don't know much about that.

22

Q Who would have this information?

23

A Manager.

24

Q Which manager would have this

25

information?

1 CHUN KIT CHENG

2 A I don't know.

3 Q So what makes you say it was the  
4 manager that would have this information?

5 A It's because it was the manager who  
6 made the arrangement.

7 Q Do you know how many days per week Xiao  
8 Hong Zheng worked at Guang Zhou Restaurant prior to  
9 2009?

10 A I don't know much about that.

11 Q Do you know how many days per week Wei  
12 Shen Tan worked at the restaurant prior to June 2009?

13 A I don't know.

14 Q From June 2007 to June 2009, do you  
15 know what time Li Rong Gao usually arrived at work?

16 A I don't know much about that.

17 Q How about for Xiao Hong Zheng?

18 A I don't know much about that.

19 Q How about Wei Shen Tan?

20 A I don't know much about that.

21 Q When you arrived at work, were they  
22 usually already there?

23 A I'm not so sure.

24 Q From June 2007 to June 2009, what time  
25 did Li Rong Gao usually finish work?



84

1

CHUN KIT CHENG

2

A I don't know much about that.

3

Q How about Xiao Hong Zheng?

4

A I don't know much about that.

5

Q And Wei Shen Tan?

6

A I don't know much about that.

7

Q Were they usually at the restaurant

8

when you finished working there?

9

A I don't know much about that.

10

Q Is there anything that would help you

11

remember this information?

12

A It's only because from time to time I

13

may leave early and I have something to do, that's

14

why I said I'm not so sure.

15

Q Is there anything that would help you

16

remember when the Plaintiffs usually got to work or

17

when the Plaintiffs usually finished work?

18

MR. CHUANG: Objection. I don't think

19

he's saying that he forgot. I think he's

20

saying he doesn't know so it assumes that

21

he forgot. You may try to answer the

22

question, but you might want to rephrase it

23

again after this.

24

Q You can go ahead and answer the

25

question.

1 CHUN KIT CHENG

2 A Let me say it again. Since I don't  
3 have a fixed work schedule at the restaurant I can  
4 leave at any time. Basically, I would not have the  
5 knowledge to know when an employee starts working or  
6 when an employee finish work.

7 Q Do you know if the wait staff had a  
8 break during their workday?

9 A I don't know much about that.

10 Q Do you know approximately how many  
11 hours the Plaintiffs worked each day?

12 A I don't know.

13 Q Was it more than ten hours per day?

14 A I don't know much about that.

15 Q Was it less than ten hours a day?

16 A As I said before, I don't know about  
17 these things. I only know about the food product.

18 Q So when you were at the restaurant,  
19 what did you do during the day regarding the food  
20 product?

21 A I just use my eyes to visually check if  
22 the food product displayed beautifully or not. If  
23 they look pretty or not.

24 Q So during your workday, where did you  
25 work in the restaurant?

86

1

CHUN KIT CHENG

2

A Kitchen.

3

Q Were you ever anywhere else in the

4

restaurant during your workday?

5

A No.

6

Q Were you ever in the office?

7

A I may have been there just to sit and

8

rest for a short while.

9

Q Was there a computer in the office?

10

A Yes.

11

Q Did you ever use the computer?

12

A No.

13

Q Did you ever have meetings with other

14

employees in the restaurant in the office?

15

A No.

16

Q Did you have meetings with managers in

17

the office?

18

A No.

19

Q Did you ever have to review any

20

documents in the restaurant during your workday? I

21

mean, did you have to review any documents in the

22

office in the restaurant during the workday?

23

A No.

24

Q Did you ever work at the cash register

25

at the restaurant?

1 CHUN KIT CHENG

2 A Sometimes. Occasionally, yes.

3 Q What would you do when you were working  
4 at the cash register?

5 A At the time when my wife needed to go  
6 to the bathroom, then I would help her out to watch  
7 the station for a while.

8 Q What did you do to watch the cash  
9 register?

10 A To help customer pay the check.

11 Q Did you ever deal with any of the  
12 vendors of the restaurant?

13 A No.

14 Q So you never paid any of the vendors of  
15 the restaurant?

16 A No.

17 Q So from approximately 1:00 in the  
18 afternoon to 9:00 or 10:00 p.m. you would be in the  
19 kitchen all day long?

20 A No.

21 Q So what else did you do?

22 A Sometimes just take a walk outside the  
23 restaurant for window shopping.

24 Q Were you window shopping for yourself  
25 or for the restaurant?

88

1

CHUN KIT CHENG

2

A For myself.

3

Q Besides that, is there anything else  
4 you would do during your workday?

5

A Well, to take a rest, to have a cup of  
6 coffee, things like that.

7

Q Did you do anything else that was  
8 required for work?

9

A No.

10

Q How long would you walk outside for to  
11 go window shopping?

12

A It varies.

13

Q Was it more than an hour?

14

A It happened.

15

Q Is this in addition to the thirty  
16 minutes to one hour break that you usually had?

17

A Yes, because my work time was all  
18 decided by myself in terms of the hours, the break  
19 time.

20

Q If the food was not presented well,  
21 what would you do?

22

A I would just talk to the cooks and tell  
23 them to re-do it.

24

Q And what if the cooks didn't do what  
25 you wanted?

1 CHUN KIT CHENG

2 A To do it over again.

3 Q Could you ever discipline any of the  
4 cooks if they didn't do what you wanted them to do?

5 A No.

6 Q Were there work schedules posted at the  
7 restaurant?

8 A I don't have clear knowledge about  
9 this.

10 Q Did you ever see any work schedules  
11 posted at the restaurant?

12 A No, I didn't.

13 Q Who told the Plaintiffs when they were  
14 required to work?

15 A I don't know much about that.

16 Q Mr. Cheng, were you paid any wages by  
17 Guang Zhou Restaurant prior to June 2009?

18 A Yes.

19 Q How much did you get paid?

20 A One dollar for one month.

21 Q From June 2007 to June 2009 you  
22 received one dollar per month?

23 A Correct.

24 Q Did that amount ever change?

25 A No.

90

1

CHUN KIT CHENG

2

Q Were you paid by cash?

3

A Yes.

4

Q The whole time, from June 2007 to June

5

2009?

6

A Yes.

7

Q Were you ever paid by check?

8

A No. The amount is too small.

9

Q Who decided how much your wages were?

10

A I made that decision.

11

Q Who gave you the one dollar a month?

12

A Manager.

13

Q Which manager?

14

A Lai An.

15

Q Did Lai An continue to pay you after he

16

left the restaurant?

17

A No.

18

Q So who did it after Lai An?

19

A Manager.

20

Q Which manager?

21

A Whoever the manager was.

22

Q Can you remember the managers name?

23

A Kevin. That's the only one I can

24

remember.

25

Q Do you remember who paid you after

92

1

CHUN KIT CHENG

2

Guang Zhou Restaurant from June 2007 to June 2009?

3

A No.

4

Q Did you receive any money from Guang

5

Zhou Restaurant as a result of your investment in

6

Perfect Team Corporation?

7

A I don't remember.

8

Q Is there anything that would help you

9

remember this?

10

A Since it was my wife who is in charge

11

of the books and records and I only in charge of the

12

kitchen, that's why.

13

Q When you received your one dollar a

14

month in wages, did you have to sign any document

15

acknowledging your receipt of the wages?

16

A No.

17

Q From June 2007 to June 2009, did you

18

have any other jobs besides your job at Guang Zhou

19

Restaurant?

20

A No.

21

Q Is it your testimony that the only

22

wages that you received from June 2007 and June 2009

23

was one dollar per month?

24

A Yes.

25

Q Did you have any other sources of



102

1

CHUN KIT CHENG

2

answer, I'm really going to ask him not to

3

answer and move on:

4

MS. TAI: I don't think he has answered

5

the question, that's my point. He's saying

6

he knows very little, I keep trying to ask

7

okay, I understand, so what is this little

8

bit he does know?

9

MR. CHUANG: I understand. You've

10

asked him the same kind of question three

11

or four times. If you want to shorten it,

12

give it one more shot, then we move on.

13

MS. TAI: All right.

14

MR. CHUANG: Okay.

15

THE INTERPRETER: The witness just said

16

I'm not so sure about that. It just means

17

I don't know.

18

MS. TAI: I'm going to ask a question,

19

it's a yes or no answer.

20

Q Do you know anything about the wages

21

that the Plaintiffs were paid at the restaurant?

22

A I don't know that. My wife handling

23

that.

24

Q It's a yes or no question.

25

A No, I don't.

1 CHUN KIT CHENG

2 Q Do you know anything about the  
3 Plaintiffs' hours that they worked at the restaurant?

4 A Are you asking about a minimum wage?

5 Q Right now I'm just asking about the  
6 hours the Plaintiffs worked at the restaurant.

7 A What do you mean by work hours? Please  
8 explain.

9 Q Can you say that again?

10 A What do you mean by work hours? Please  
11 explain.

12 Q What I mean is the hours that the  
13 Plaintiffs actually worked at the restaurant.

14 A No, I don't.

15 Q Did you ever discuss with anyone at the  
16 restaurant how much the restaurant was going to pay  
17 any of its employees?

18 A No.

19 Q Isn't it true that you gave Wei Shen  
20 Tan a raise in approximately January 2009?

21 A No.

22 Q Prior to June 2009, did the restaurant  
23 keep track of the amount of time that the Plaintiffs  
24 worked?

25 A I don't know.

118

1

CHUN KIT CHENG

2

recordings?

3

A I didn't ask anyone. I don't know.

4

Q Do you know that you were under an

5

obligation to look for these recordings as part of

6

this case?

7

A Obligation? What do you mean by that?

8

Q As part of this case Plaintiffs asked

9

you and Perfect Team Corporation to provide certain

10

documents including electronic documents and we

11

specifically asked about video recordings so my

12

question is: Did you know that you were under an

13

obligation to go look for these documents as part of

14

this case?

15

A Well, it's possible that it was my wife

16

who asked someone to search for that kind of

17

recordings, however, I have no knowledge about that.

18

Q Do you know who your wife would have

19

asked?

20

A I don't know.

21

Q Do you know if the recordings that were

22

turned over were all the recordings that the

23

restaurant had?

24

A I don't know.

25

Q Mr. Cheng, were there any federal or

1 CHUN KIT CHENG

2 state labor law posters at Guang Zhou Restaurant  
3 before June 2009?

4 A Yes.

5 Q Where were these posters posted at the  
6 restaurant?

7 A At the door.

8 Q Which door?

9 A The door on the second floor.

10 Q The front door?

11 A No, I'm talking about an inside door.  
12 Inside door.

13 Q Inside the door. So was it in the  
14 dining room?

15 A Yes.

16 Q When were these posters posted on the  
17 wall?

18 A I don't know. It was my wife who take  
19 care of that kind of thing.

20 Q So did your wife post them at the  
21 restaurant?

22 A I'm not so sure about that. It's  
23 possible she might just ask some employees to do  
24 that.

25 Q But your wife was the one in charge of

120

1

CHUN KIT CHENG

2 the posters?

3 A I believe so.

4 Q Do you know if the posters were posted  
5 in 2007?

6 A Yes.

7 Q How do you know that?

8 A Because once it was posted, I saw that.

9 Q When in 2007 was it posted?

10 A I don't remember.

11 Q Was it towards the end of 2007?

12 A I don't remember.

13 Q Was it when the restaurant opened in  
14 2007?

15 A I don't remember.

16 Q Do you know where these posters came  
17 from?

18 A I don't know. They were brought back  
19 by my wife.

20 Q Do you know who your wife got them  
21 from?

22 A Correct, I don't know.

23 Q Were these posters up on the wall in  
24 2008?

25 A Yes, they were there.

1 CHUN KIT CHENG

2 Q The whole year?

3 A Yes.

4 Q 2009?

5 A Yes. I believe they were there, too.

6 Q The whole time?

7 A Yes.

8 Q What information was on the poster?

9 A I remember one of them said something  
10 about the minimum wage.

11 Q What did it say about the minimum wage?

12 A It said something about how much each  
13 hour should be paid.

14 Q What did it say about how much each  
15 hour they should be paid?

16 A I don't remember since the rate was  
17 adjusted every year so I don't remember.

18 Q Did someone replace the posters on the  
19 wall from time to time?

20 A I don't know. It was my wife who would  
21 be the one to handle this.

22 Q Did the poster say anything about tips?

23 A Well, I seldom pay attention to this  
24 kind of thing so I don't know much about that.

25 Q Did the poster say anything about

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CHUN KIT CHENG

2 overtime?

3

A I believe it must have something said  
4 about this topic, however, in terms of the tips, they  
5 just distributed the tips among them so I don't know  
6 much about that.

7

Q My question was about overtime.

8

A I have seen that.

9

Q Okay. What language were these posters  
10 in?

11

A English.

12

Q So how do you know what those posters  
13 said if they were in English?

14

A Well, there were some employees who  
15 explained the contents to me.

16

Q What did they explain to you?

17

A They were saying something like the  
18 overtime pay should be one point five times the  
19 regular rate and besides that, I just cannot remember  
20 too much.

21

Q Which employees explained this to you?

22

A I don't know, I forgot. I just cannot  
23 recall.

24

Q When did they explain this to you?

25

A A few days after they were posted.

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CHUN KIT CHENG

2

minimum wage and overtime laws?

3

A Yes.

4

Q What did you think the restaurant was

5

doing to comply with the labor laws?

6

A We had posted those papers on the wall.

7

Q Anything else?

8

A Other than that, I don't know.

9

Q Besides learning from the poster about

10

the minimum wage law, did you learn this information

11

from anywhere else?

12

A No.

13

Q Besides the poster, did you learn about

14

overtime laws from any other sources?

15

A I don't know.

16

Q You don't know or you don't remember?

17

A Well, since this area belongs to Lai

18

An, I don't have much knowledge about that.

19

Q After Lai An left, who dealt with this

20

issue?

21

A As I said before, it was my wife.

22

Q If Lai An dealt with this issue, how

23

come you had to instruct him to talk to the workers

24

about minimum wage laws?

25

A What I did was just to remind him.



1 CHUN KIT CHENG

2 Q Prior to June 2009, did you do anything  
3 to determine whether the restaurant was paying the  
4 wait-staff the minimum wage?

5 A You want to know what have we done  
6 regarding that?

7 Q My question is whether he had done  
8 anything.

9 A I have seen the poster, that's it.  
10 Other than that, it was my wife who was taking care  
11 of things in that area.

12 Q So did you do anything to determine  
13 whether the restaurant was paying the wait staff  
14 overtime?

15 A No, nothing.

16 Q In one of Perfect Team's interrogatory  
17 responses it states that Xiao Hong Zheng stirred up  
18 disaffection among employees. Can you explain what  
19 Perfect Team meant by this?

20 A I don't know much about that.

21 Q Okay. I'm going to show you what was  
22 previously marked as Exhibit No. 15. Plaintiff's  
23 Exhibit No. 15. I'm sorry, maybe I have them wrong  
24 here. Plaintiff's Exhibit No. 14, page 7. The third  
25 sentence to interrogatory fifteen of Plaintiff's

1 CHUN KIT CHENG

2 A No.

3 Q Have you heard of Jing Fong Restaurant?

4 A Can you repeat the question?

5 MS. TAI: Can you repeat the question,  
6 please?

7 (Whereupon, the requested question was  
8 read back by the reporter.)

9 A Yes.

10 Q Are you aware that that restaurant was  
11 sued?

12 A No idea.

13 Q Have you heard of a restaurant called  
14 88 Palace?

15 A No.

16 Q When did Perfect Team stop operating  
17 Guang Zhou Restaurant?

18 A I believe it was May 31st of 2009.

19 Q Who made the decision to stop operating  
20 the restaurant?

21 A Me.

22 Q Were there other people involved in  
23 making this decision?

24 A No.

25 Q When did you decide to stop operating